

## U.S. ENVIRONMENTAL PROTECTION AGENCY



## REGION X

IDAHO OPERATIONS OFFICE  
422 WEST WASHINGTON STREET  
BOISE, IDAHO 83702

April 7, 1994

CERTIFIED MAIL

Mr. Antonio Chavez  
Pintlar Corporation  
P.O. Box 480  
Kellogg, Idaho 83837

Dear Mr. Chavez:

During our previous discussion on the cut and wrap removal method for pipe insulation, I have referenced §61.145(c)(4) of the Asbestos NESHAP (40 CFR Part 61). This section states that when facility components are removed whole or in sections, it must be stripped or contained in leak-tight wrappings except as described in paragraph (c)(5).

Paragraph (c)(5) states that only large facility components such as reactor vessels, large tanks and steam generators need not be stripped. Pipe sections do not fall in this category.

The paragraph you referenced in the OSHA statute deals with small scale, short duration projects only. The removal of pipe insulation in the zinc plant does not meet the definition of small scale, short duration.

The cut and wrap removal method for pipe insulation is considered a dry removal. The NESHAP allows for dry removal only when wet removal would cause a safety hazard or excessive equipment damage. The operator must then apply in writing to the NESHAP Administrator for permission to conduct dry removal and must describe how their situation meets the dry removal criteria. Dry removal may only occur if the operator must has obtained written permission from the NESHAP Administrator. The removal of pipes in the zinc plant do not meet the criteria required to receive permission to conduct dry removal.

If you have further questions concerning this matter, you may contact me at (208) 334-1626.

Sincerely,

*Rebecca L. Goehring*  
Rebecca L. Goehring  
Asbestos Program Coordinator

cc: Armina Nolan  
Nick Ceto  
Scott Peterson

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